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Attorney for: Defendant Gregory Burleson

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES,

Plaintiff,

vs.

GREGORY BURLESON,

Defendant.

No. 2:16-cr-046-GMN-NJK

STIPULATION FOR EXTENSION OF
TIME TO FILE DEFENDANT'S REPLY TO
GOVERNMENT'S RESPONSE TO
DEFENDANT'S EMERGENCY MOTION
FOR MODIFICATION OF SENTENCE
AND COMPASSIONATE RELEASE AND
PROPOSED ORDER (E.C.F. No. 3448)

CERTIFICATION: This Stipulation is timely filed.

IT IS HEREBY STIPULATED AND AGREED by and between Christopher Choiu, Acting, United States Attorney, and Steven Myhre, Assistant United States Attorney, counsel for the government, and Mark D. Eibert, counsel for the defendant Gregory Burleson, that the deadline for the defense to file a reply to the government's Response to Defendant's Emergency Motion for Modification of Sentence and Compassionate Release (ECF No. 3529) be extended from its current due date of March 8, 2021 to on or before **March 22, 2021**, a total extension of 14 days.

This stipulation is entered into for the following reasons:

1. On January 29, 2021, Defendant Burleson filed his motion for compassionate release. E.C.F. No. 3522.
2. On February 3, the parties filed a stipulation agreeing to a 24 day extension of time for the government to file its response to that motion due to government counsel's scheduling conflicts. E.C.F. No. 3523. That stipulation was granted the following day. E.C.F. No. 3524.
3. On March 1, 2021 the government filed its response to the compassionate release motion. E.C.F. no. 3529.
4. Due to the need to get the government's response to the defendant in prison in Florida, consult with him, and then possibly get a new declaration sent to him and returned, and due also to defense counsel's schedule on other matters, the defendant respectfully requests a first, 14 day extension of time to and including March 22, 2021 to file his reply.
5. This request is not for the purpose of delay, and no prior extensions have been requested for this reply brief. Defendant Greg Burleson is currently serving an 819 month federal prison sentence in USP Coleman II in Florida.
6. Government counsel, AUSA Steven Myhre, agrees to this extension.

WHEREFORE, the parties respectfully request that the Court accept this Stipulation and enter an Order requiring the defense to file its Reply to the government's Response to the defendant's compassionate release motion on or before **March 22, 2021**. For the convenience of the Court, a draft Order has been prepared and is attached to this Stipulation.

DATED this 2nd day of March, 2021.

// s // Steven Myhre

STEVEN MYHRE

Assistant United States Attorney
Counsel for the United States

// s // Mark D. Eibert

MARK D. EIBERT

Counsel for Defendant Gregory Burleson

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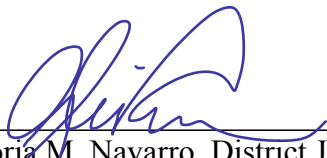
ORDER

This matter coming on the parties' Stipulation for Extension of Time to File Defendant's Reply to Government's Response to the defendant's compassionate release motion (E.C.F. No. 3522, 3529), the Court having considered the premises therein, and for good cause shown, the Court accepts the Stipulation and **ORDERS** as follows:

1. The filing date for the defendant's reply, presently set for March 8, is **VACATED** and **CONTINUED**:
2. The defendant's reply shall be filed on or before **March 22, 2021**.

IT IS SO ORDERED.

Dated this 2 day of March, 2021.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that his business mailing address is P. O. Box 1126, Half Moon Bay, CA 94019, that he is not a party to this action, that he is a citizen of the United States of such age and discretion to be competent to serve papers, and that on the below date he caused a true and accurate copy of

STIPULATION FOR EXTENSION OF TIME AND PROPOSED ORDER

To be served via ECF on the United States District Court, which will e-serve counsel of record in this case, including the following:

STEVEN MYHRE, ESQ.
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, NV 89101

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief. Executed on March 2, 2021 at Half Moon Bay, California.

/s/ Mark D. Eibert